UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WISCONSIN GREEN BAY DIVISION

TIFFANY DOBERSTEIN on behalf of herself and all others similarly situated,

Plaintiff,

Case No. 18-cv-1931

v.

EAST WISCONSIN SAVINGS BANK,

Defendant.

PLAINTIFF'S MOTION FOR ATTORNEYS' FEES AND COSTS

COMES NOW Plaintiff, Tiffany Doberstein, on behalf of herself and all others similarly situated, by and through her attorneys, Walcheske & Luzi, LLC, and pursuant to 29 U.S.C. § 216(b), Wis. Stat. § 109.03(6), and Civil L. R. 7, respectfully Motions this Court for an award of attorneys' fees and costs on the grounds set forth below, in Plaintiff's supporting Brief, and in the accompanying Declarations of Attorneys Scott S. Luzi, David M. Potteiger, Larry A. Johnson, and Summer Hart Murshid.

- 1. Plaintiff's counsel has achieved substantial and considerable success both for herself and all others similarly situated by recovering a monetary amount from Defendant in accordance with that which she sought and/or was alleged, thus making her a "prevailing party" under the Fair Labor Standards Act and Wisconsin's Wage Payment and Collection Laws;
- 2. Plaintiff's counsel Motions this Court for an award of attorneys' fees and reimbursement for costs in the amount of \$25,000.00; and

3. As set forth in greater detail in Plaintiff's supporting Brief, the requested award is based on and consistent with the rates of other attorneys in the community and as approved in similar matters before courts in this District and/or in this State, and it is reasonable given Plaintiff's success in this matter, the complexity of the claims and defenses in this matter and, ultimately, the public interests advanced by Plaintiff's litigation.

WHEREFORE, Plaintiff respectfully requests that the Court award attorneys' fees and costs as set forth above.

Dated this 1st day of November, 2019.

WALCHESKE & LUZI, LLC Counsel for Plaintiff

s/ David M. Potteiger

James A. Walcheske, State Bar No. 1065635 Scott S. Luzi, State Bar No. 1067405 David M. Potteiger, State Bar No. 1067009

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